

## REMARKS

Claims 1 through 20 are pending in this application. Claim 9 has been amended for clarity, claims 11 and 15 have been amended to correct typographical errors.

The Office Action asserts that under 35 U.S.C. §102(e), claims 1 through 17 and 20 are anticipated by U.S. Patent Application No. 2003/0004868 to Early.

Independent claim 1 recites a computer-implemented method of providing a credit limit. The method includes receiving a request for a credit limit related to an entity, retrieving an aggressive value from an aggressive model of business data associated with the entity, retrieving a conservative value from a conservative model of business data associated with the entity, and providing a recommendation based on the aggressive value and the conservative value. The aggressive value and the conservative value are co-existing.

Early discloses a system and method for managing a credit card having an adjustable credit limit. The card issuer tracks the cardholder's use of the credit card to ensure that the cardholder does not spend beyond his or her ability to pay the outstanding balance. To track the cardholder's use, a Tier 1 and Tier 2 limit is established for the cardholder. The Tier 2 limit is associated with the actual credit limit of the account; the Tier 1 limit corresponds to a lower limit signaling when the Tier 2 limit is close to being exceeded. See paragraph [0020].

Early fails to anticipate claim 1. A claim is anticipated only if each and every element set forth in the claim is described, either expressly or inherently, in a single prior art reference. MPEP 2131. Early does not disclose or suggest retrieving an aggressive value from an aggressive model of business data associated with an entity, retrieving a conservative value from a conservative model of business data associated with the same entity, and providing a recommendation based on the aggressive and conservative values.

Early fails to disclose an aggressive value and a conservative value. The Office Action implies that the Tier 1 and Tier 2 limits described in Early correspond to the aggressive value and conservative value disclosed in claim 1. This implication is not supported by the disclosure in Early. The Tier 1 limit corresponds to a lower limit signaling when the Tier 2 limit is close to being exceeded; the values of the Tier 1 and Tier 2 limits cannot properly be described as an aggressive value and a conservative value. The Office Action argues that "the features upon which applicant relies (i.e., the credit limit values are independent from one another and are based on separate criteria) are not recited in the rejected claim(s)." However, claim 1 clearly indicates that the aggressive value and conservative value are derived from an aggressive model and a conservative model, respectively. Early does not disclose or suggest that the Tier 1 and Tier 2 limits are derived from an aggressive model and a conservative model; Early therefore does not anticipate claim 1.

Additionally, Early does not disclose or suggest the step of providing a recommendation, let alone providing a recommendation based on the aggressive value and the conservative value. The method of Early is used to **automatically** manage the credit limit of an account. If certain criteria are met, the credit limit is adjusted without the intervention of a user; no recommendation is given. For example, if the Tier 1 limit exceeds the maximum limit, a processor automatically adjusts the Tier 1 limit. See paragraph [0025]. Because Early does not disclose the step of providing a recommendation, Early does not anticipate claim 1.

Claims 2 through 10 depend from independent claim 1 and are not anticipated by Early for at least the reasons given above regarding claim 1.

Claim 2 recites the method of claim 1, wherein the recommendation is provided to a user from a website via a browser. Early does not disclose or suggest providing a recommendation, let alone providing a recommendation to a user from a website via a browser. Early discloses using a point-of-sale terminal, a credit card clearing house,

and a central data processor to practice the method described in the disclosure. See paragraph [0023]. In the method disclosed in Early, a merchant uses the point of sale terminal to obtain approval for a specific credit card transaction. Early does not disclose using a website to provide a recommendation. For this additional reason, Early does not anticipate claim 2.

Claim 3 recites the method of claim 1, further comprising prompting a user for the request from a business report associated with the entity via a clickable link. Early fails to disclose these steps. For this additional reason, Early does not anticipate claim 3.

Claims 11 and 12 include elements similar to those of claim 1. Therefore, for at least reasoning similar to that provided in support of the patentability of claim 1, claims 11 and 12 are patentable over Early.

Claim 12 recites, among other things, a display having a clickable link to a credit limit recommendation for an entity. The Office Action has failed to show where Early discloses or suggests a display having a clickable link to a credit limit recommendation. For this additional reason, claim 12 is not anticipated by Early.

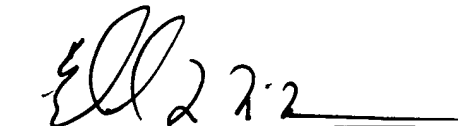
Claims 13 through 17 and 20 depend from independent claim 12 and are patentable over Early for at least the reasons outlined above regarding claim 12. In addition, Early fails to disclose or suggest a recommendation including a risk category, as disclosed in claim 14, and an explanation when the risk category is high, as disclosed in claim 15.

The Office Action also asserts that under 35 U.S.C. §103(a), claims 18 and 19 are obvious in view of Early. As indicated above, claim 12 is patentable over Early. Claims 18 and 19 depend from claim 12. Therefore, claims 18 and 19 are patentable over Early for at least the reasons given above regarding claim 12.

In view of the above, Applicants respectfully submit that all claims presented in this application are patentably distinguishable over the cited reference. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'E. McMahon', is written over a horizontal line.

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